

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Modernizing the E-rate)	WC Docket No. 13-184
Program for Schools and Libraries)	

**COMMENTS BY LOS ANGELES UNIFIED SCHOOL DISTRICT RELATED TO THE
E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING**

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I. Introduction



As the second largest school district in the nation, LAUSD enrolls more than 640,000 students in kindergarten through 12th grade, across 900 schools and 187 public charter schools. The district's boundaries encompass over 720 square miles including the city of Los Angeles as well as 31 smaller municipalities, including several unincorporated areas of Southern California. All youth achieving is the mission of LAUSD. This focus is reflected in continued double-digit growth on the state Academic Performance Index (API); the upward trend in the graduation rate, progress in the pass rate on the California High School Exit Exam (CAHSEE) and other academic indicators.

Support of the Common Core State Standards (CCSS) is one way the district intends to carry out its mission. Another priority is the district's emphasis on an individualized, interactive, and information rich educational experience. This fall 2013, the district is embarking upon the Common Core Technology project (CCTP), a one to one implementation designed to provide all students a personalized learning environment.

The CCTP is powered by technology and has required massive upgrades to existing technology systems and infrastructure, for the sole purpose of ensuring educators and students in every classroom, have the tools to create learning environments designed to increase student engagement, student learning and ultimately academic success.

Five national developments drive our transformation. They are:

1. California's Adoption of Common Core State Standards and Assessments
2. The proliferation of Hybrid/Blended Learning Strategies and Personalized Learning for each Student
3. Digital and Online Advancements in Instructional Materials
4. Advancements in Mobile Technology
5. A Persistent Budget Crisis Requiring Resource Optimization



A. Executive Summary



LAUSD is pleased to provide feedback to the Notice of Proposed Rule Making. We believe the K-12 educational system has the capacity to transform to meet the demands of a global economy, and E-rate is a vital program to ensure our success to meet this national imperative.

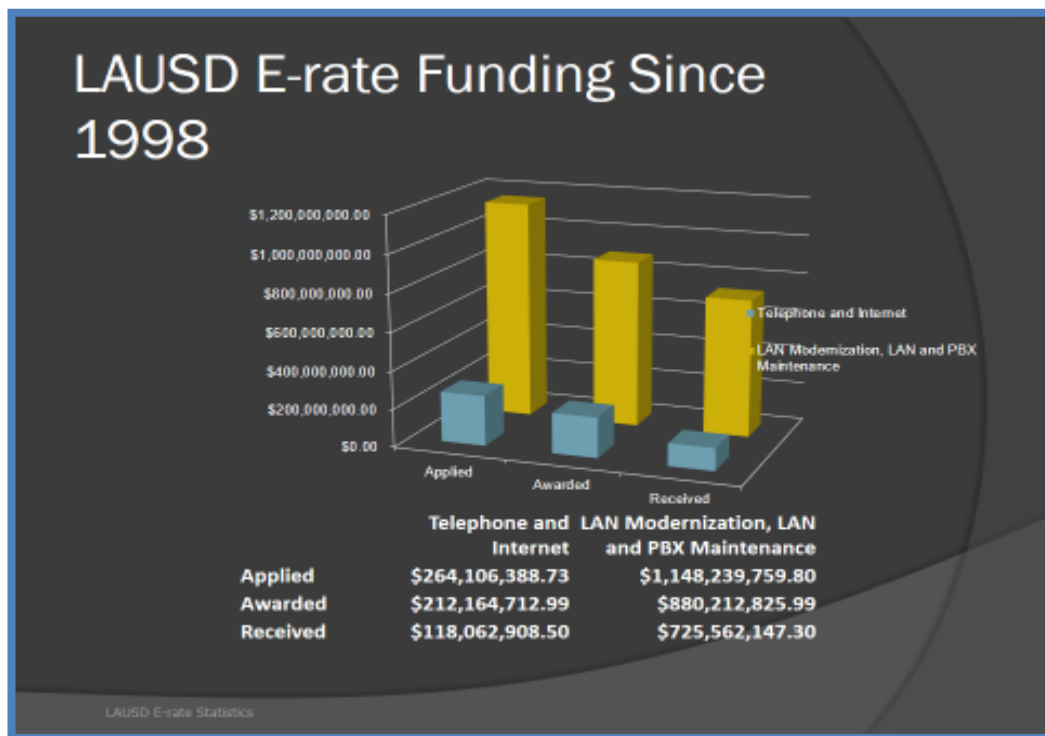
The benefits the E-Rate program has offered to Schools and libraries throughout the nation, is remarkable. In our opinion, the program has become the primary foundation of funding for digital education in America, with more than 100,000 schools and libraries connected to the Internet. It is clear why the program has been widely hailed as a great success.

In LAUSD alone, the program helps to fund:

- Basic telephone and Internet access services for nearly 1,100 schools and offices
- Internet connectivity to more than 32,000 classrooms
- Technical support, maintenance of LANs and telephone systems at over 700 schools and centers
- Installation and/or modernization of telephone systems and/or local area networks for more than 700 K12 schools
- Phone lines and data lines for new schools
- Network equipment and telephone switches for new schools
- Cellular/mobile service for eligible staff at eligible sites
- Network equipment (firewall) to stop unauthorized access to student information and protect computers from attacks over the network



II. FUNDING AUGMENTATIONS THAT ACCOMMODATE DISTRICT PRIORITIES & STREAMLINE THE PROCESS



LAUSD E-Rate funding since 1998

A. Los Angeles Unified School District – Funding and Initiatives.

As the graphic above illustrates, LAUSD has received significant assistance through the E-rate program. This is one of the many reasons that LAUSD submits these comments for the Commission's consideration.

When the program was implemented in 1998, schools and libraries were just beginning to embrace and understand the long term implications of digital technologies; as a driving force for innovative teaching and learning practices. Since then great strides have been made to make available internet access and technology resources in the classroom, which has fast become a prerequisite. However, although many districts access the Internet through a direct (i.e., broadband) connection in place of dial-up, the vast majority still view the current speeds as insufficient to meet the ever increasing demands for bandwidth.

The FCC itself recognized this issue in its 2010 E-Rate Program and Broadband Usage Survey Report¹ which showed that almost 80% of all school and library respondents said their broadband connections did not always meet their needs.

¹ http://transition.fcc.gov/010511_Eratereport.pdf



As it is with many of our colleagues throughout the states, cities and local communities across the nation, Los Angeles is experiencing firsthand the enormous implications for technologies capacity to improve educational outcomes. Increasing our student's access to information and collaboration is now considered fundamental for today's student and is particularly relevant in light of the national education reforms underway to ensure that America's students are competitive. Concurrently, if we are to compete in a global economy, public policy goals must also support our efforts in K-12 to increase the number of graduates in science, technology, engineering, and math (STEM) fields.

Other nations are making major investments in digital education. If the U.S. does not make commensurate investments, it risks falling further behind. We believe the efforts underway by the FCC to improve the E-Rate program, coupled with the national priority President Obama has established through his ConnectEd initiative – are certainly big steps in the right direction; further advancing the historical strides our nation continues to make on the path of ensuring an exemplary public education for all kids.

LAUSD's priority is to focus on specific initiatives intended to give our kids the very best chance to succeed. The district understands that to be successful, technology **MUST** play a pivotal role. This is why we began a transformation of our infrastructure to prepare and equip every classroom with the foundation necessary to provide a high-quality, digitally enabled learning experience that prepares every student for the 21st century's globally competitive workforce.

Our capital investments toward this initiative--known as the Virtual Learning Complex (VLC) -- represent the transformation of the District into a technology enabled learning environment, free of the confines of time or place. It promotes an active engagement of students in their studies and immediate and timely information access for their families, educators, and administrators in an anytime-anywhere learning infrastructure. The District's Information Technology Division is leveraging voter-approved Bonds and additional funding sources to make these critical investments possible.

The question we are now asking is, how do we sustain the support of the VLC and other priority technology systems and resources after the bond initiative is completed; especially if the E-rate program, our only source of Federal funding is not effectively leveraged to meet the practical needs of our students here in Southern California and across the nation?



III. LAUSD RECOMMENDATIONS FOR MODERNIZING AND STREAMLINING E-RATE



A. Raising the E-Rate Program CAP

Our nation's schools today have the densest broadband needs of any users - more than businesses, hotels, hospitals, or entertainment venues. Schools need sufficient infrastructure for networks to enable learning applications, including routers and wireless access points, and resources to keep these high-capacity networks running. Schools' and libraries' broadband and technology needs are, therefore, as great as or greater than comparably sized businesses. LAUSD requires access to enterprise-grade services and technology.

Unfortunately, as schools' and libraries' technology needs have grown, E-Rate funding has not kept pace. Funding requests outstrip the funding cap nearly every year - usually by more than 150 percent or more. Under current prioritization rules, requests for Priority One services exceed the funding cap, leaving infrastructure (Priority Two) requests unfunded. As a result, students risk falling further behind the students in other countries, where governments have made connected learning a priority. LAUSD's schools cannot prepare students to be competitive in a knowledge-based, connected next-generation workplace with outdated, 20th century technology.

E-Rate funding levels must ensure the program's long-term financial security. This requires recognizing that connecting schools and libraries is not a one-time endeavor. Networks require continuous support to keep them running efficiently. In addition, connectivity is an evolving technology. Providing only one-time support for schools' and libraries' technology infrastructure needs essentially builds an educational bridge to nowhere, wasting funds that could be spent more effectively on the ongoing costs of real and future networks for a connected learning environment. Therefore, LAUSD does not support a solely temporary increase to the E-Rate Program's current cap.

LAUSD supports a **permanent increase to the funding cap** to a minimum of \$5B per year. This number is also widely supported by ISTE in its outreach to its members throughout the nation².

² <https://www.iste.org/about-iste/advocacy/e-rate>



B. Discount Calculation Modifications

LAUSD believes that changing the manner in which districts calculate their E-rate discounts will simplify the program for applicants as well as USAC. As stated in SECA's E-Rate 2.0 White Paper, "the current discount calculation rules were established to assign a discount for each service depending on which buildings are receiving that service. This method of discount calculation is based on the premise that a poor school building in a district needs a greater discount than the more wealthy buildings in that district because a poorer population could not pay as much for the services as the population of the families with more financial resources. The faulty assumption in this method of discount calculation is that individual school buildings have their own local taxing authority whereas in reality they do not have a budget that is legally separate from the district's budget. Tax bases are calculated on an entire district population, not just those of a subset of schools. School districts are the administrative authorities over all of their schools. The revised district-wide discount formula is based on a districts actual accounting practices and organizational structure."³

LAUSD agrees with this analysis.

SECA goes on to say, "Besides providing greater equity based on actual local taxing structures, this proposal would greatly simplify the Form 471 Block 4 for applicants to complete. Currently, a district calculates its discount in no less than seven (7) steps. Under the proposed district-wide simple average discount calculation, a district would only need to complete two (2) steps to calculate the district discount rate for shared services – calculating the percentage of students in the entire district that are eligible for the NSLP and identifying the straight matrix discount. The discount would remain the same for all Priority 1 and Priority 2 services, regardless of the individual entities within the district that are receiving the service at the time the Form 471 is filed. Should the Commission choose to continue with the rural/urban designation which adds a 5% or 10% discount for rural school buildings in certain NSLP eligibility bands, SECA proposes that the rural/urban factor be factored in district-wide based on the location of the district's central office facility – in other words, the building in which the school district superintendent's office resides."⁴

LAUSD wholly supports this suggestion.

Finally, SECA's comprehensive white paper continues with, "Clearly, the flexibility that the Commission was attempting to provide in the Second Order has been exacerbated with the imposition of more, rather than less administrative burden on applicants. Fortunately, this flexibility can be restored with the adoption of the shared discount simplification proposal. Because districts would no longer be required to separately identify each NIF, the additional NIF certifications that have been imposed on applicants would no longer be necessary. Instead,

³ See <http://apps.fcc.gov/ecfs/document/view?id=7520924964> (filed 6/25/13) at page 15

⁴ See <http://apps.fcc.gov/ecfs/document/view?id=7520924964> (filed 6/25/13) at page 15



applicants would be required to certify that shared services will be provided only to eligible schools and eligible non- instructional facilities as part of the Block 6 Certifications on FCC Form 471. This is a simple and elegant solution to what is now a complex issue.”⁵

Again, LAUSD supports this simplified approach for discount calculation.

LAUSD **does not** support revising the discount matrix to increase certain applicant’s matching requirements. This approach penalizes districts and schools that have a higher population of students in the free and reduced lunch program. Reducing each discount level by a set percentage, such as five or ten percent is more equitable. Any formula that singles out shifting discounts and resources from districts receiving higher discounts impacts the students that are already identified as having greatest number of students on the free and reduced lunch program.

C. Setting Budgets or Limits

LAUSD could support a budget approach that provides funding prior to the start of a school year, with some caveat(s). The application should be a high level access plan that includes a mobility strategy that addresses core content mobility, security requirements, level of management and support, broadband capacity requirements, and wireless requirements. A contract and Form 471 could be an attachment for each section. Applicants should identify how other areas of the plan will be funded. The E-rate program could/should provide a minimal set of discounts for all applicants first and then additional discounts on a per student (or per patron) formula. The minimal discounts could perhaps be based on minimal bandwidth to schools and then additional discounts could be based on the district-wide percentage of students qualifying for free and reduced lunch program. Applicants should be responsible to fund a minimum of services and equipment equal to the delta between percentage of students on free and reduced lunch program and actual costs to implement and support an instructional mobility strategy. Unless there are significant and permanent dollar increases to the program there will not be enough E-rate funds to meet all costs associated for true instructional mobility therefore, districts and schools need flexibility to determine priorities and trade-offs.

A budget approach with broader eligibility that more comprehensively defines ‘access’ is a more flexible strategy, allowing for needed focus on technology solutions that encompass mobility strategies to support instruction, on-line assessment, and delivery of core content. This focus eliminates the need for the two-in-five rule, the Technology Plan, and a detailed Eligible Service List. This method also eliminates funding priority and instead focuses on the ‘whole network’ approach, giving applicants the local control they need to make informed decisions that are best for them.

⁵ See <http://apps.fcc.gov/ecfs/document/view?id=7520924964> (filed 6/25/13) at page 15



D. The FCC's E-Rate Program Should Support Cohesive, Cost-Effective Networks Including 3G/4G/LTE Connectivity:

Today's connected learning environment depends on delivering multimedia information to classrooms, students, and faculty, and doing so across a range of devices to different buildings and student homes. These capabilities require school districts and individual schools to provide a high- bandwidth, high-performance network at all times. This also requires comprehensive, enterprise-grade broadband and network solutions to enable these capabilities.

In short, today's connected learning environment cannot be provisioned with a basic Internet connection and simple inside wiring alone. Schools need sufficiently robust broadband connectivity in and out of the school and sufficient broadband connectivity within the school. But a modern network must also include network management and maintenance, safety and security solutions, access and distribution layer infrastructure, wireless availability and access points, video endpoints, local caching, cloud services, and mobile access solutions for students and faculty working on educational projects outside of the school.

The E-Rate Program, therefore, should support enterprise-grade, service-oriented networks for schools and libraries that operate as a whole to provide these services. The program also should support network architectures that ensure adequate capacity and scalability for the useful life of the network, ensuring long-term efficiency and cost- effectiveness.

The problem is that the current and proposed E-rate funded model to enhance access to advanced telecommunications and information services to schools does not meet the student's needs in schools or districts deploying and supporting digital learning environments. When the E-rate program started, the focus was on providing connectivity to a school and wired connections in the classrooms. A few years ago there was a shift to include wireless at schools and a few schools and districts piloted one-to-one initiatives utilizing cellular wireless. Neither approach seems to adequately meet Section 254(h), which requires the commission to enhance access to advanced telecommunication and information services to schools and libraries. More importantly there are still too many students struggling with access to digital content outside of the classroom.

All students need access all the time. This means full mobility, the ability for students and staff to use multiple devices, fully protected, and having access to digital content from any location. It opens opportunities for students to use their own devices as well as multiple district provided devices to access digital content and other instructional resources. True mobility is much more than wireless access alone. True mobility introduces new challenges that require tradeoffs to effectively manage the limited dollars provided by the E-rate program.

3G/4G/LTE cellular broadband connectivity is contributing to the potential for dramatically improved educational outcomes by extending the learning environment beyond the school walls,



giving students access to their materials, teachers, tutors and their peers anytime and anywhere. However, not every parent can afford to buy a device and monthly broadband connectivity for each child, and schools lack the funding to provide devices and connectivity. LAUSD believes the FCC can and should act to solve this problem.

In 2010, the FCC's National Broadband Plan called for modernization of E-Rate to cover mobile devices and off-campus connectivity⁶. In fact, in 2011, the FCC launched its "Learning on the Go" Program, which provided funding for mobile devices and off campus mobile broadband connectivity in 20 *pilot* projects. However, this current Rule Making proceeding, focuses on funding fiber deployment within schools and community centers and providing only Wi-Fi connectivity at these locations, and goes on to suggest that there may not be any funding for ANY 3G/4G/LTE connectivity (whether on or off-campus).

LAUSD does not support the notion of the E-Rate program funding ONLY fiber on campus with Wi-Fi access for the following reasons:

- Smartphones and tablets, when used with 3G/4G/LTE mobile broadband access, allow students to learn on a 24/7 basis, which can dramatically improve educational achievement.
- Without federal support, low-income students will not be able to keep pace with students that can afford devices and 24/7 wireless access and a new digital divide will emerge – a "mobile divide".
- E-readers cost less than paper textbooks; can hold many more books and reference sources; enable development of customized curricula; and provide a dynamic reading experience that blends written content with audio/video content however, without anytime and anywhere access, E-readers lose much of their impact; both economically and educationally
- There is no question that home access to broadband is critically important to the student of today. By the time a student turns 18, only 13% of the student's waking life has been spent in a classroom. Enabling learning outside of the classroom is crucial to improving education.

E. The FCC Should Set Goals That Address Present and Future Bandwidth Needs:

LAUSD is encouraged by the FCC's suggested Internet connectivity goal of 100 Mb per 1,000 users by 2014 (increasing to 1 Gb per 1,000 users by 2017) and the WAN connectivity goal of 10 Gb per 1,000 users by 2017; though there continues to be spirited debate around just how much bandwidth schools and students need and **concurrent use** should absolutely be a factor used in determining **true bandwidth need**.

⁶ <http://www.broadband.gov/plan/11-education/>



On many levels, we agree with Fresno Unified School District's comments on this subject. FUSD states, "...Assuming worst-case numbers, if every one of a thousand students is watching a different video at this bit rate, and at exactly the same time as every other student, then one would need 3,000 Mbits/sec or about 3 Gbit/sec for 1000 students. Conversely, if the 'cap' is 1 Gbps per 1,000 students, then the assumed maximum concurrency is 33%. These concurrent user assumptions should be explicitly stated as part of the usage modeling, not implied; and they should be calibrated according to grade level."⁷

For example, the first phase of our CCTP initiative comprised 37,000 students. Initial findings project an increase of four to five times the current site bandwidth usage. Bandwidth considerations associated with digital curriculum, online assessments, teacher training applications, learning management systems, business applications, and network architecture and infrastructure dynamics make forecasting bandwidth requirements very difficult however, the goals suggested in the NPRM may be a bit 'ambitious'.

Fresno USD's statistical analysis presents a staggering amount of WAN connectivity need based on the goals as stated by the Commission⁸. If FUSD's data is translated to accommodate LAUSD's enrollment, the WAN connectivity required throughout the District would equal an inconceivable 6,400 GB (= 640,000/10) and our Internet bandwidth would equal an unimaginable 64,000 GB (= 640,000/1).

We feel it is important the Commission consider that no single solution works in all situations and districts should have the flexibility to consider both site wireless and cellular in-building technologies. When determining their solutions, there should be some evidence of on-going capacity planning tied to examples of applications or instructional resources with some documentation of actual usage. This practice helps demonstrate greater management of limited dollars. This approach also meets Section 254(h) of the Telecommunications Act of 1996, which requires the Commission to enhance access to advanced telecommunications and information to schools and libraries "to the extent technically feasible and economically reasonable"⁹.

F. The FCC Should Eliminate the Prioritization of Services over Networks:

In order to promote the efficient use of E-Rate support, the FCC should eliminate the current rule that creates an artificial funding priority for telecommunications or Internet access services over the networks used to provide those services (the Priority 1/Priority 2 distinction). The current rule leads educators to structure their funding requests (and ultimately, their purchasing decisions) in inefficient ways in order to increase their likelihood of being funded. In some cases this means schools can over-order voice and broadband access services and neglect the internal

⁷ See Fresno USD's NPRM Comments <http://apps.fcc.gov/ecfs/document/view?id=7520942771> filed 9/10/13 at Page 2

⁸ See *supra* note 7

⁹ <http://transition.fcc.gov/learnnet/254.html>



networks that are used to distribute those services among schools within a district and among classrooms within a school. In our experience, this is a significant factor contributing to the lack of adequate broadband capacity. In many cases, the issue is not the inability to obtain or afford adequate bandwidth into and out of the school or district; rather, it is that we cannot afford adequate bandwidth within the schools themselves. Or, even if we can afford to install adequate connectivity within the school, we cannot afford to maintain it.

Currently, Priority Two funding does not guarantee access to all students. This is even true with Priority One funding given the funding demand for 2013 and the likely trend for 2014.. The current E-rate program assumption is that by providing more bandwidth to sites or to students, access will increase. There are many reasons *access* could be restricted or non-existent. For example, interference on wireless networks, too many devices and not enough wireless access points, network failure, lack of an identity management solution, poor or lack of device management, no solution to access specific applications and a host of other technologies essential to access and management of limited bandwidth.

There needs to be greater flexibility to both funding and access solutions for districts if the FCC is going to meet the requirements of Section 254(h)¹⁰, which requires the Commission to “...enhance access to advanced telecommunication and information services to schools and libraries”. Further, the goal needs to reach down to the student that must always have anywhere, anytime and reliable access.

Priority 1 funding should focus on the transport of high speed data and Internet communications and should transition away from voice services and web hosting. While some stakeholders may advocate that no eligible service changes should be made, and we should focus all efforts on increasing funding, we believe addressing the program’s chronic underfunding will take both a change in the eligible services’ structure ***and*** an increase in the funding. Thus, in that we believe it is the best interests of the program, we offer this solution.

G. The FCC Should Simplify Participation in the Program:

LAUSD believes the current administrative application process to obtain E-Rate funding is daunting. Schools that take the time to parse the complex rules and assign dedicated staff to focus solely on E-Rate compliance or those that can afford to hire E-Rate consultants to do so - fare better than schools that do not, irrespective of their relative need for support. This can lead to undesirable outcomes in the allocation of support among schools. The complexity of the rules also results in costs for all participants in the process, and these resources are effectively “dead weight loss” that could be better spent on services.

¹⁰ See *supra* note 9



The E-Rate Program would be both fairer and more efficient if the administrative process were simpler. The FCC should carefully consider ways to streamline the application process. It should study educational entities' regular processes for procuring goods and services, and align the E-Rate process as closely as possible with standard educational procurement processes. The FCC should also look at ways for districts and consortia to apply in a more effective way.

G1. Form 486 Modifications

For example, LAUSD fully supports SECA's suggestion(s) regarding changes to the Form 486 process. "...the Form 486 has become an obstacle to applicants receiving the benefit of their approved E-rate funding. SECA recommends the following changes that will align the Form 486 with the other simplification methods. The form is required to be submitted by 120 days from the issuance of the Funding Commitment Decisions Letter or 120 days from the service start date, whichever is later. If an applicant misses the deadline, funding is rescinded for every day that the form is late and can often lead to the rescission of the entire approved funding request.

Applicants should be given the option to provide the information currently required on Form 486 as part of their completion of Form 471. Applicants who prefer to continue filing Form 486 should be given that option and a check box to designate this preference should be included on form 471.

To eliminate the current penalty of full rescission of funding for missing the Form 486 procedural deadline, SECA recommends the following specific modifications:

Certification: The form's current purpose is to provide the Schools and Libraries Division with a document where the applicant self-certifies three (3) items; service start date, compliance with the Children's Internet Protection Act (CIPA) and the existence of an approved technology plan, if required. The Form also provides the name of the entity that approved the technology plan. Most of the certifications can be included or already appear on the Form 471. If an applicant so chooses, the certifications should be made available on the Form 471. 2. Block 2: Early Filing Information and CIPA Waiver Requests

Early Filing: Applicants find this certification confusing and it appears to provide no additional information or value than what is required in Block 3 Item 7. This certification should be removed from the form. CIPA waiver should remain on the form in order to provide new applicants or applicants with new services to become compliant within the pre-described timeframe of the third year of requesting discounts. This certification should be moved from the current location on the form to the same location as the remaining certifications.

CIPA Waiver for Libraries for funding year 2004: This certification is out-of-date and should be removed from the form."¹¹

¹¹ See *supra* notes 3-5 at pages 16-17



G2. Administrator's Transparency

LAUSD fully supports the following additional Commission recommendations to streamline the e-rate process:

- Require all forms and USAC correspondence to be submitted/sent electronically and archived by USAC so that an applicant or auditor could have access to the data
- Provide more detailed and comprehensive funding status throughout the application process including estimates of when an application is scheduled to be reviewed
- Speeding-up review of applications and issuance of commitment decisions by approving applications on a per FRN basis rather than a per application basis
- Removing the distinction between telecommunications services and Internet access
- Considering lesser recovery actions for rule violations or decisions made during PIA review unless there is criminal activity.
- More effectively identify and capture unused funds by setting a time schedule and notifying applicants and service providers of the impending sweep
- Streamlining the E-Rate application process by allowing multi-year contracts to be approved in the first year of the contract and not require the filing of additional Form 471s for subsequent years of the contract.
- Provide approved master purchase agreements for e-rate eligible goods and services that would not require intense PIA review.

H. FCC Should Implement A Unified Customer Portal Access Platform to More Efficiently Administer E-rate:

As stated by SECA in their E-Rate 2.0 White Paper, "When E-rate first began in 1997, almost a generation ago, the technology for online processing of applications was primitive compared to the sophisticated systems now ubiquitously implemented for online transactions. In the intervening 15 years, additional online functionality has been introduced for E- Rate stakeholders but the systems are segmented, fractured, non-intuitive, difficult to navigate and prone to crashing. USAC is to be commended for its recent request for input concerning E-Rate systems' redesign. SECA strongly believes there is a need for advanced data management systems in order to improve the overall efficiency of the program. The concept would be an improved E-rate program which includes improved system functionality that provides applicants with the online tools and access to data necessary to participate effectively and efficiently in the program."¹²

We support others in the K-12 community, including SECA, who envision a virtually paperless E-rate application process where all current functions would be conducted online via the E-rate Portal, comparable to a commercial online banking or other online transaction systems.

¹² See *supra* notes 3-5 at pages 17-18



We agree with SECA that, "... the cost of deploying a paperless E-rate process will quickly be offset with the savings that will be achieved from greatly reducing the time and personnel costs associated with the current manner of processing forms and certifications. There remain many paper processes that need to be fully automated and integrated into the data processing system; for example, there are still far too many certifications, Item 21 attachments, SPIN changes, service substitution requests, and invoice deadline extension requests, submitted on paper, fax or email."¹³

IV. Conclusion



We believe our progress as a District to innovate teaching and learning is advanced only through a shared responsibility between our faculty, students, parents, the greater K-12 community – working cohesively with each other and Federal agencies like the FCC, to build our children's future. We are delighted to participate in such an important endeavor, to improve the nation's E-Rate program.

Cordially,

A handwritten signature in blue ink, appearing to read "Ronald S. Chandler".

Ronald S. Chandler
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A handwritten signature in black ink, appearing to read "Richard Quinones".

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¹³ See *supra* notes 3-5 at page 18